

UNITED STATES DISTRICT COURT FOR  
THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

NETLIST, INC.,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No. 2:22-cv-203-JRG
	)	
MICRON TECHNOLOGY, INC.;	)	JURY TRIAL DEMANDED
MICRON SEMICONDUCTOR	)	
PRODUCTS, INC.; MICRON	)	
TECHNOLOGY TEXAS LLC,	)	
	)	
Defendants.	)	

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**DECLARATION OF JASON G. SHEASBY IN SUPPORT OF**  
**PLAINTIFF NETLIST, INC.'S MOTION FOR PARTIAL SUMMARY**  
**JUDGMENT FINDING ALLEGED PRIOR ART NOT PUBLICLY**  
**ACCESSIBLE**

**I, Jason G. Sheasby, declare as follows:**

1. I am an attorney at the law firm of Irell & Manella LLP, counsel of record for Plaintiff Netlist, Inc. (“Netlist”) in the above-captioned action. I am a member in good standing of the State Bar of California and have been admitted to practice *pro hac vice* before this Court in this action. I provide this declaration in support of Netlist, Inc.’s Motion for Partial Summary Judgment Finding Alleged Prior Art Not Publicly Accessible. I have personal knowledge of the facts stated herein, and could and would testify completely thereto if called as a witness in this matter.

2. Attached as **Exhibit 1** is a true and correct copy of Sean J. Keller, *The Physical Design of the Illiac 6 Supercomputing Platform* (MICNL203-00006829).

3. Attached as **Exhibit 2** is a true and correct excerpted copy of the Rebuttal Expert Report of Peter Gillingham, dated October 30, 2023.

4. Attached as **Exhibit 3** is a true and correct excerpted copy of the Expert Report of John Halbert, dated October 4, 2023.

5. Attached as **Exhibit 4** is a true and correct excerpted copy of the deposition transcript of John B. Halbert, dated September 30, 2023.

6. Attached as **Exhibit 5** is a true and correct excerpted copy of the deposition transcript of Frank Ross, dated August 17, 2023.

7. Attached as **Exhibit 6** is a true and correct excerpted copy of the Expert Report of Harold Stone, dated October 4, 2023.

8. Attached as **Exhibit 7** a true and correct excerpted copy of the March 28, 2023 Pre-Trial Conference transcript from *Netlist v. Samsung*, Case No. 2:21-cv-463-JRG.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on November 14, 2023, in Los Angeles, California.

By */s/ Jason G. Sheasby*

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Jason G. Sheasby